DELETE DELETE DELETE – MODIFY MODIFY MODIFY COMMENTS
GN Docket No. 25-133
WOLF Radio, Inc.
April, 2025

FM Radio:

1) 73.210(a): Add a last sentence: Class C3, and C2 stations may also be authorized in Zone I.

Justification: This is to give more flexibility for Class A stations to upgrade without having to potentially reduce previously existing coverage due to having to increase protection to themselves (60 dBu down to 57 dBu) from other co- and/or adjacent channel stations. The current rule restricts certain stations from upgrading at all and/or requiring the use of a directional antenna where one would not be needed if the extra protection to itself were not required. Rules sections (b)(2), (b)(3), and (b)(4) would need rewording, as necessary, to correlate to this change.

2) 73.215(e): State additional Class C3, and C2 minimum distance separation requirements to accommodate 73.210(a) above.

Justification: This would be necessary for modification of Section 73.210(a) as suggested above.

3) 73.215(e): reduce minimum distance separation requirements to allow stations greater flexibility to upgrade to a higher class by employing directional antennas, as permitted in Section 73.316.

Justification: This would give certain Class A stations additional flexibility to upgrade, especially in rural areas of the Northeast where stations would not otherwise have the opportunity to upgrade. It must be noted that when Zones were first defined, many areas other than the Northeast, Mid-West, or Southern California were much more sparsely populated, but over time these formerly less-populated areas have now become large population areas while areas in Zone I such as Illinois, Indiana, Ohio, Pennsylvania, and parts of the States of Massachusetts, Michigan, New Hampshire, Maine, New York and Vermont have lost population.

4) 73.322(a)(4): modify to: Double sideband, <u>or single sideband</u>, suppressed carrier……..

Justification: The addition of single sideband has no negative effect to stereophonic operation, but can have a positive effect on reducing multipath, especially over rough terrain due a lower modulation index (sideband closer in frequency to baseband). Before digital technology existed, it would have been virtually impossible, practically or economically, to manufacture a stereo generator capable of producing a stereophonic subcarrier with single sideband amplitude modulation. The ability to use SSB now with digital technology is a win-win.

5) 73.222(a)(7)(i): modify to: When a signal exists in only one channel of…..the baseband range of 50 Hz to 15 kHz shall not exceed 90%.....and modulation…..in the baseband

range shall not exceed 90%. The sum of both channels regardless of each channel's independent level must not exceed 90%.

Justification: This restriction unnecessarily reduces the overall volume. For example, if one person is speaking on the left channel and another on the right channel, when listening on a monaural receiver such as a table radio, or now more common with Bluetooth speakers, the overall volume is unnecessarily reduced by 3 dB thereby creating a higher background noise level and also inconsistent with maintaining as high an average modulation level as possible.

AM Radio:

6) 73.3571(a)(1): add to second sentence: ……first, second, or third adjacent channels and a daytime station requesting a frequency change to a frequency abandoned by any previously licensed station where there was any overlap of the previously licensed station's protected and/or interfering contour with that of the station requesting the frequency change regardless of frequency.

Justification: This would be to permit an existing daytime AM station to move to a lower or better frequency to improve its coverage as a minor technical change.

FM Translators:

7) 74.1204(a) (1)(2)(3): remove 600 kHz protection

Justification: No longer needed. These rules haven't changed in 50+ years. All FM radios have vastly improved selectivity, Significant improvements were achieved especially due to the implementation of HD radio which demanded that receiver manufacturers, with or without HD decoders, improve selectivity to avoid interference from adjacent channels.

8) 74.1204(g): Delete

Justification: All FM radio receivers have improved to the point where the approximate 4 dB difference between 99 watts and 250 watts ERP is negligible for any increased receiver intermodulation due to IF, and that it is unnecessary to restrict FM translators from utilizing a full 250 watts ERP with regard to IF. As such, all FM translators 250 watts or less ERP should be classified as Class D.

9) 74.1205: Delete

Justification: Completely irrelevant today for FM translators.

10) 74.1250(c)(5): match modulation requirements to that of 73.1570(b)(2)

Justification: FM translators should be able to frequency deviate to the same parameters as that of the primary station it is rebroadcasting.

Class A Television, LPTV and TV Translators:

11) 73.6007 and 74.735(b)(2): modify to 30 kW

Justification: UHF Class A, LPTV, and TV translator stations were authorized for 150 kW ERP when analog or 3% of the power for full-power stations (5000 kW). When DTV conversion occurred for full-power stations, many stations complained that their 50 kW equivalent was not enough, and the Commission permitted all full-power UHF stations to request up to 1000 kW as long as no prohibitive interference would occur. Likewise, 15 kW for LPTV and TV translators did and does not replicate coverage of what existed prior to DTV conversion. Provided no interference would be caused, all Class A, LPTV and TV Translators should be permitted the same 3% of that for full-power stations which would be 30 kW. In addition, as was permitted for previous analog operation, Class A, LPTV, and TV Translators should be able to specify a maximum power (30 kW or less ERP) below the horizon, utilizing electrical and/or mechanical beam tilt as necessary or desired) to protect other authorized or licensed stations of any class.

LPTV and TV Translators:

12) 74.790(o)(3): modify to may be conducted on 87.7 or 87.75 MHz

Justification: The general public is not served as well as could be due to some FM receivers that can tune 87.7, but do not properly demodulate a signal on 87.75 MHz, and may be heard only with considerable audio distortion due to the narrow bandwidth of the I.F. stage within the receiver. As long as the LPTV station operating in ATSC 3.0 can demonstrate no interference to the television portion of the signal and that the ATSC 3.0 signal meets the mask requirements, 87.7 MHz operation should be permitted.

13) 74.790(o)(7) : modify to allow for minor modifications as permitted in 73.3572(a)(2)

Justification: LPTV stations with FM6 operations should be permitted some flexibility in location of their transmitter site to best serve the general public at large, and not be frozen to their existing authorization except in the case of loss of a transmitter site or a change in equipment due to malfunction as the only justification for a change in location.

Respectfully submitted.

WOLF Radio, Inc.

By: Craig Fox, President

April 11, 2025